

REMARKS

Claims 1-33 are pending in the application and stand rejected. Claims 1, 14, 17, 20, 23 and 27 have been amended and claims 12 and 15 have been canceled without prejudice.

Applicants respectfully request reconsideration of the claim rejections and objections in view of the above amendments and following remarks.

Claim Objections

Claims 16, 19, 25 and 26 were objected as being improper dependent claim format. Although no specific reasons were provided in the Office Action, Applicants respectfully assert that such claims are proper. These claims recite program storage devices that include program of instructions executable by the machine to perform the method steps of the respective base claims. These claims thus appear to be clear and in proper format. Accordingly, withdrawal of the objections is respectfully requested.

Claim Rejections - 35 U.S.C. § 102

Claims 1-3, 8, 11-13 and 27-30 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,748,186 to Raman. At the very minimum, claims 1 and 27 are patentable over Raman because Raman does not disclose retrieving and processing a modality-independent document which is an intent-based document, as essentially claimed in claims 1 and 27. Indeed, an “intent-based” document is a modality-independent document which describes the user interaction (dialog or conversation”) with the application, wherein the user interaction is separated from other aspects of the application such as presentation.

On page 4 of the Office action, the Examiner relies on the modality-independent document, taught as the use of HTML documents for conversion to a common intermediate

structure (Col. 3, lines 36-38) as being an “intent-based” document. Indeed, it is well known in the art that the Web HTML documents are not “modality-independent intent based” documents. And although Raman arguably discloses generating a “common intermediate representation” of an HTML document, for instance, such common representation comprises structure and content of the HTML document (see, e.g., Abstract, FIG. 2, Col. 2, lines 27-35, for example) There is simply no teaching of a modality-independent intent-based document in Raman.

Therefore claims 1 and 27 (and pending dependent claims) are believed to be patentably distinct and patentable over Raman. Accordingly, withdrawal of the anticipation rejections is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 4,-7, 9, 10, 14-26, 32 and 33 stand rejected as being unpatentable over Raman and U.S. Patent Application Publication No 2002/0032564 to Ehsani. Applicants respectfully submit that at the very minimum, the combination of Raman and Ehsani is legally deficient to establish a *prima facie* case of obviousness since the combination does not disclose or suggest processing intent-based documents, as recited in the claims. Accordingly, withdrawal of the rejections under 35 U.S.C. 103 is respectfully requested.

Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants’ undersigned attorney.

Respectfully submitted,



Frank DeRosa
Reg. No. 43,584
Attorney for Applicants

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL.: (516) 692-8888
FAX: (516) 692-8889